REMARKS

Claims 3, 11, and 13-30 are pending in this application. Claims 3, 14, 15, 17, 18, 22 and 23 have been amended by this Amendment. The Office Action dated October 20, 2005 rejected all of the pending claims as being rendered obvious by the prior art.

Claims 3, 13-20 and 26-30

The grounds for the obviousness rejection of claims 3, 13-20 and 26-30 is set forth in part 2 on pages 2-6 of the Office Action. Specifically, the claims are rejected as being obvious over the electronic device shown in Figs. 1-4 and discussed in paragraph 0021 of U.S. Published Patent Application No. 2002/0151334 to Sharma (this device hereinafter referred to simply as "Sharma") in view of U.S. Patent No. 5,797,098 to Schroeder et al and further in view of U.S. Patent No. 6,801,659 to O'Dell. Applicants respectfully traverse the rejection at least because it fails to establish a prima facie case that the applied references suggest an electronic device having each and every one of the combination of features recited in the rejected claims.

For example, independent claims 3 and 13 (claims 14-20 and 26-30 are dependent claims) recite the feature of displaying a plurality of selected words in an order "based on the frequency of use of the plurality of the selected words by the user." The rejection acknowledges that this feature is not present in Sharma and is not taught by the Schroeder patent. However, the rejection asserts that this feature is taught at col. 4, lines 25-31, and col. 7, lines 29-39, of the O'Dell patent, and that it would have been obvious to modify Sharma "with the word use frequency method of O'Dell for the purpose of providing faster text entry to a user as taught by O'Dell."

The O'Dell patent discusses the entry of text into an electronic apparatus. The user is initially presented with a start screen (see Fig. 7a) which enables the user to select a letter. Once a letter is selected, different combination of letters starting with the selected letter are displayed on a work screen according to their frequency of use. See Fig. 7b. The user can select one of these letter combinations to then be presented with a choice of a longer combination of letters or a choice of complete words.

Alternatively, the user may select a 'WL' icon in the top of the left hand portion of any work screen to access a scrollable list of words. The list shown will begin with the letter group

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on which the cursor is resting at the time the word list search key is pressed, and will be

displayed according to their frequency of use. This is described at col. 7, lines 29-43, as follows:

> "To assist further with spelling problems and as an aid to faster entry for some users, the
> user can—by clicking a `WL` icon in the top of the left hand portion of any Work Screen—access a
> scrollable list of words that begin with any displayed letter group. The list shown will begin with
> the letter group on which the cursor is resting at the time the `word list search key` is pressed, and
> will be displayed in frequency-of-use order—at least those words whose frequency of use is great
> enough to be likely to be helpful to the user—or in alphabetical order or in a combination of the
> two. Any word on these lists can be sent to the text line by simply moving the cursor to it with the
> up-down arrow keys and pressing the `select word` key. The user can abandon the search and
> return to the previous work screen at any time by simply hitting the left-arrow key." (emphasis
> added)

Although the patent discusses displaying words in frequency-of-use order, that order is

not determined by the frequency of use of those words by the user as recited in the rejected

claims. The user is mentioned, but what is being described in this passage is which words are to

be displayed in frequency-of-use order. Of course, the displayed words are described as being

"likely to be helpful to the user" and it is not stated that the words displayed in an order

determined by the frequency of use of the user.

The determination of the displayed words and of the frequency of use of those words in

the preferred embodiments of the O'Dell patent is discussed at col. 3, lines 42-67, of the patent.

However, this discussion is not addressed in the rejection. The preferred embodiments include a

dictionary storage 12 that stores and lists words according to their frequency of use. Specifically,

the order of the words is predetermined as a result of a survey of the English language as covered

by "contemporary publications such as major newspapers, books and periodicals." The survey

was designed to measure "the frequency with which particular letter combinations are found in

common usage." (emphasis added). In other words, the frequency-of-use of words is

predetermined in the O'Dell patent and stored in the dictionary 12 accordingly. It is not based on,

and does not depend on, the frequency of use of words by the user of the device as recited in the

rejected claims.

Claim 15

Claim 15 is dependent on independent claim 13 and further recites features related to

updating counter bits for each word used by the user and modifying the order of the displayed

words based on the counter bits. The discussion in the O'Dell patent addressed above teaches

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using a predetermined order based on frequency of use in common usage, and thus teaches away from the features recited in dependent claim 15.

Claims 11 and 21-25

The grounds for the obviousness rejection of claims 11 and 21-25 is set forth in part 3 on pages 6-8 of the Office Action. Specifically, the claims are rejected as being obvious over the method of predicting text shown in Fig. 4 and discussed at col. 6, lines 17-41, of U.S. Patent No. 5,797,098 to Schroeder et al (this method hereinafter being referred to simply as "Schroeder") in view of U.S. Patent No. 6,801,659 to O'Dell. Applicants respectfully traverse the rejection at least because it fails to establish a prima facie case that the applied references suggest a method of predicting text having each and every one of the combination of features recited in the rejected claims.

For example, independent claim 11 recites the feature of displaying a plurality of selected words in an order "based on the frequency of use of the plurality of the selected words by the user." The rejection acknowledges that this feature is not present in Schroeder. However, the rejection asserts that this feature is taught at col. 7, lines 29 to 39, of the O'Dell patent, and that it would have been obvious to use the word use frequency method taught by O'Dell in the wireless phone of Schroeder "for the purpose of providing faster text entry to a user as taught by O'Dell."

Applicant respectfully traverses the rejection for the same reasons given above with respect to independent claims 3 and 13. Regardless of whether or not the O'Dell patent teaches preferred embodiment that result in faster text entry, it does not teach the features recited in the rejected claims that the display of words is based on the frequency of use by the user.

Amended Claims 14, 17 and 22

Applicants have amended dependent claims 14, 17 and 22 to recite that the frequency of use by the user "is determined dynamically" at the time of text entry by the user. Exemplary, non-limiting, support for this amendment can be found at page 9, line 30, to page 10, line 2, of the specification. As discussed above, the frequency of use applied in the preferred embodiments taught by the O'Dell patent is predetermined based on common usage. Applicants respectfully

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submit that dependent claims 14, 17 and 22 are allowable for this further reason in addition to those set forth above.
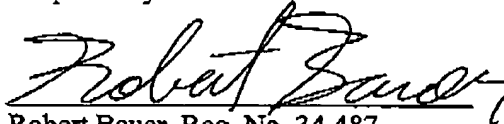
<u>Amended Claims 15, 18 and 23</u>

Applicants have amended dependent claims 15, 18 and 23 to recite that new words may be added to the plurality of words in the dictionary to be displayed according to frequency of use by the user. Exemplary, non-limiting, support for this amendment can be found at page 9, lines 4-9, of the specification. As discussed above, the most frequently used words in common usage are stored and are "likely to be helpful" to the user in the O'Dell patent, and there is no indication that new words can be added. Applicants respectfully submit that dependent claims 14, 17 and 22 are allowable for this further reason in addition to those set forth above.

A Petition for Extension of Time accompanies this Amendment. Applicants do not believe any additional fees are due with this amendment. However, the Commissioner is hereby authorized to charge any additional fees, which may be required with this communication, or credit any overpayment to Deposit Account No. <u>10-0100</u> (NOKIA.41US).

Respectfully Submitted,

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